

U.S. District Court For Delaware

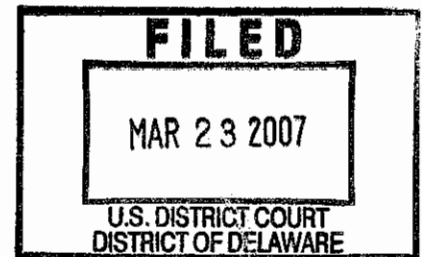
DETLEF HARTMANN, and as one of classes,
Petitioner,

v.

CARL HAZZARD, and those similarly
situated as him,
Respondents.

NO. 06-340-***

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21 March 2007

Supplement Facts and Laws Update and Newly Discovered

Request this Honorable Court ^{accept} this Supplement in the interest of justice to stop obstructions to Petitioner and classes, wards of state and mentally disabled under the American Disabilities Act and Rehabilitation Act, for legal access to the courts constitutional and statutory and federal objectives rights!

1. Petitioner, and as one of classes, requires timely relief from further irreparable damages caused by Respondents and their continues deliberate indifference to the laws of this land, acting under color of law, making this Supplement part of the 42 USC § 1983 ^{and 42} motions already filed for this case, and discrimination going on here at Delaware Correctional Center under the Dept of Corrections supervision, and Fane Brady's former supervision as attorney general for this state, being the moving forces to deprive of legal access to courts.

Namely, also Stanley Taylor, former Dept of Corrections Commissioner, Paul Howard, former Bureau Chief, Robert Snyder former Warden of Delaware Correctional Center^(DCC), now Thomas Carroll, all working in harmony, as conspiracy and organized crime in state government to deprive citizens of their basic, fundamental rights to legal access to courts, upon which all other rights depend upon. Because of these years of handicaps, obstruction, disabilities, and inabilities, Petitioner has not been able to file a meritorious motion any sooner in this Court to stop the official oppression, abuse of authority, breach of duty ~~and~~ ^{by} legal custodians, and R.I.C.O. type violation using the federal postal system to perpetrate their crimes. More on this below.

2. Petitioner has 9 active cases, mostly due to Respondents damages caused by their maliciousness, desire to cause injury and distress, ill-will towards Petitioner, and those similarly situated to him as ward of state not being violent at all, nor verbally abusive as Hazzard, et. al., to be named if necessary, are. This conduct adds to the continued illegal conduct by Hazzard of mass punishment, over regimentation, inherently suspect ~~treatment~~ of all treatment by Hazzard, et. al., degrading, disrespectful, inhumane conduct compounding to cruel and unusual conduct in an ever more civilized society, modern, and decent, to Petitioner and those similarly situated to him, terroristic and tortures conduct having caused, and continuing to cause mental, emotional, physical damages to Petitioner for which he is being medically, partially treated here at D.C.C., thus actually not treated, just attempted to be covered up with drugs.

3. A claim of ongoing pattern and practice of harassment, incitement, worry and impede legal access to courts by repeated raids ~~and~~ with

illegal threats to get rid of legal materials, by continually annoying and disrupting legal access to courts, pestering, plaguing, bedeviling, malicious conduct by Respondents Hazzard, and those similarly situated in his conduct, • condoning, enforcing illegal conduct of an illegal prison rule well aware of by laymen, if they can bring meritorious writings to court of competence and without conflict of interest.

Copy of years of grievances to attain legal access to courts to be mailed to this Court as soon as possible. Preventive measures had to be taken from Hazzard and Henry from destroying evidence in their malicious state of mind and conduct for legal access to courts.

Both agreed they knew of the obstruction of justice and denial of access to courts illegal conduct they were performing threatening to seize legal materials.

_____ Henry, Cpt, forced Petitioner to throw away 4 boxes, 1' x 15", away of legal materials on 6+7 March, 2007. She was informed that the option of sending them home would be like throwing them away for me. I need ready, almost daily access to certain things for 9 active cases, and contemplated one still being delayed by those illegally obstructive conditions at DCC to the courts, and custodians deliberate indifference to that. This antiquated, ill-will attitude still existing here by some old-time relics still working here must be extinguished, who have been getting away with this conduct here because no citizen here has been able to bring this to court for proper relief from evil spirit.

Postage I would have to pay for to send boxes home would further obstruct my legal access to courts because then I would have no materials supplies to mail it and write on, and with for at least two months at current, other illegal conditions requiring indigent

indigent to pay for all his/her legal postage and supplies when custodian has legal duty to provide (free) all necessities of life for a ward of state a state chose to take into custody. And that prison rule also denies Petitioner the food and medication he still has to buy from the commissary when custodian must provide all 'necessities of life' by law.

Thus, current illegal prison rules makes, forces Petitioner, as one of class of inmates, discriminated against by law, to be an indentured servant in violation of the Constitution and laws.

Thus, restraining order and preliminary injunction is vital to stop all obstructions not actually, proven, security issue; there is always a way to provide Constitutional conditions, but certain states of mind don't want to do their duty.

Hazzard was mailed, in house mail, a copy of previous court motions filed in this case on Mar 7, 2007.

Cpt Henry forced me to sign 'Removal of Personal Items' form #208, Rev. 7/95, or lose all my legal materials on 7 Mar; 6 PM, in front of 3 other witnessing correctional officers.

Cpt Henry was informed by me that my family would not know what to do with the legal stuff I send them, what to mail back as needed, which is actually not allowed because it would cause me excess legal materials under current illegal conditions. It could take my family member hours, days to find the paper I need, if they could ever find it, not knowing what they are looking at. Mailing home also obstructs access to courts in a timely manner, as it would also deny equal access like attorneys, non-imprisoned, and non-indigent have, deny effective access for certain consequence or outcome, deny meaningful access to convey, or intended to be conveyed information in a legally, meritorious manner, deny capable

access to be able, in meritorious capacity, more competently present the issues in a legally sufficient manner, and deny adequate access sufficient for a legally specific requirement, denying Constitutional access, and fundamentally fair and meaningful access.

Correctional Officers Totinich, W. McGinnis, and Jason Evers were witnesses to Henry's conduct.

An inmate witness said he had never seen her so abusive in conduct, except once, in the about 18 years he has been here. This further suggests, higher authority causing her to do such blatantly illegal conduct. His name kept anonymous for now due to history of illegal retaliation by Respondents, as of course seen and confirmed in this case, ill-will still engrained here in some staff members not held accountable to law still.

I had to rush to sort out my legal materials most valuable right now, as seen by myself at this time. My hands were trembling, papers shaking as I tried to read + sort high speed. Emotionally distraught, overwhelmed by custodians damaging conduct still getting away with in this modern, day and age in a civilized society. T-2

Mar 7, Hazard threatens all inmates who filed a grievance, a right, will be moved to another building denying, for one, legal state statutory right to an organized and harmonious environment, not a terroristic and tortures one as is to Petitioner, and those similarly situated, but deliberate indifferent to by custodians; illegal retaliation.

As one can start to see, the systemic, pattern and practice, and snowballing affect of illegal conditions worsened conditions affecting one another. Therefore, at this time, Petitioner can only bring

1.
the main ~~three~~ three issues in this complaint of denial of legal materials,
2. denial of necessities of life for legal access to courts like free postage + supplies, and 3. unobstructed access to information and the courts, because, perhaps this Court can provide legal, timely relief for the later two claims in federal district and third circuit courts with grave delays. Hopefully these illegal conditions can be taken care of at home to allow them to be most in federal court. Legal counsel needed for timely, efficient relief.

There are too many illegal prison conditions for petitioners to bring up all at once, which further obstructs legal access to courts, timely, equal, effective, meaningful, capable, and adequate, unless of course, competent counsel is immediately appointed to take care of it all in time, legally, for equal protection of the laws for All. ^{dis}

I had become too tired from all the stress and already physical disability not yet here treated, caused me to need to sleep all day off and on. This further delays my legal access to courts, those days this occurs.

Inmate witness described Cpt Henry's conduct as a threatening tone, loud and most assertive, shaking her head, finger pointing, before I signed, under torture - mental causing physical injuries, the property form to send a few folders home for my use when I get home.

March 10, I sent a letter to Commissioner Denberg, a courtesy copy of the letter to Deputy Warden Pierce at DCL for relief from illegal threat of seizure of all legal materials by Hazard on March 15 or after.

My legal access to law library, with the illegal obstructions, continues to be denied due to grievance hearings scheduled for me only on one of the two - two hour periods per week ~~for the building~~ for the building I am in, T2, has access to the law library.

Also, medical appointments are forced mandatory by Warden Carroll, but not the generally accepted professional standard where automatic rescheduling is done,

but to further obstruct my, and class members wards of state, legal access to courts. All obstructions to full-time access to law libraries must be removed. Custodians illegally caused obstructions when they are NOT necessary. Deliberate indifference and ill-will denied growth of law library as prison population grew over last 40 years or so. Space could have been made all along. When there is a will, there is a way, if someone is in right intention, as custodians should be, to uphold All of wards of states right, to properly "care and maintain" for wards.

Six Month Financial Statement was mailed to your Court on Mar 14, when allowed to photocopy in law library to mail you your copy.

To further show Hazzards state of mind, Mar 18, Sunday, T2 building had been out of heat since Thursday when last nights temperature hit 15° windchill, and this is a concrete block building without insulation. Today, some guards finally complained to the right person supervisor the right way just to get the heat turned on by a flip of switch, upon info and belief, which could have been done Thursday. But, Hazzard did not like that possibly because guards went over his head, then he shows up in this building today to incite, begile, frustrate, and alike inmates with petty rules he makes up, not legally approved nor written, like no stuff on inmates table except TV and fan, no clothes on metal conduit, in his beligerent, disrespectful, abusive, exploitative of voice, instead of setting a proper example as a professional, courteous by law, and Prison Mission Statement, and as a proper custodian would be, and as a trained guard would conduct themselves in front of mentally or emotionally disabled inmates to NOT cause further damage as he does to Petitioner, and similarly situated disabled, under constant threat of menacing by a custodian.

Petitioner is finally able to start to explain the abuse and exploitation he has been going through here DCC the last seven years, with greater disabilities and lack of treatment, just like these malicious custodians want it, for an inmate to sleep his time away and not want anything a custodian should supply. Proper leadership is needed, accountability, monitoring, interviews of inmates, to expose degrading conditions past custodians continued to cover-up, and unable inmates could/can communicate to a proper person.

Then, Mar 18, 1030 AM, Hazzard, during his disruptive tour/visit, He barks out saying that living in this building, T2, medical unit is a privilege. These threats need to stop which cause me physical injuries from this constant terroristic and tortures environment, and probably others so similarly situated who have not been able to communicate to a proper, caring authority as this Court. In summary, people like me are being made worse in here requiring more government assistance when I get out, instead of less, to be a better contributing member of society. The systemic holocaust is severe requiring competent monitoring.

Then Hazzard says out loud to incite inmates, all want to move out of this building, when that is NOT true, only a few do, vast majority want to stay. All my past experience here and many others is that it illegally required physical violence before anyone would get moved. The inconsistency is gravely unprofessional and adds to Petitioner's torture, and physical degradation.

Here I have to sit on a Sunday, spending me day to try to get relief from tortures. Where deprivations of FIRST Amendment right are involved, irreparable injury is presumed for purpose of injunctive relief under §1983,

959 F. Supp. 1280 (1996).

Thus, Hazards continues threat of F2, medical, chronic care building housing being a 'privilege', causes further unnecessary physical, mental, emotional damages to Petitioner, and those similarly situated, and other inmates who are continually being threatened to be moved to not access their ^{own} right to redress grievances. How would you like to have one in authority over you weekly, about, come threaten you that you ~~are~~ may be moved. This conduct is blatantly also contrary to state law requiring an "organized and harmonious" environment for many well known reasons.

Instead of doing his job, Hazard threatens, instead of just getting the heat turned on. But, he would still rather incite and cause ill-will. It's like kicking us while we are down.

Now, I still live under daily threat of further confiscation and other retaliatory, harassing action.

About the federal postal system, Petitioner, and as one of inmate class are still being forced, illegally, to use that system, when wards of state should be allowed state mail system use. Wards of state are a sacred thing verse the material things that are taken care of by the state mail system. Thus, wards of state, all their actions are official business probably, since we are more than just 'property of the state'.

Even indigents are forced to use postal system when it is the State's duty to provide any and all 'necessities of life' which includes all legal actions for or about the ward. Precedence exists. Cite unavailable now to me.

Denial of state mail system further exploits, abuses, delays, and/or denys, me also, of legal communication rights which should be unobstructed, timely, effective, equal, meaningful, capable, and adequate access rights by atleast the FIRST Amendment of the U.S. Constitution for information, press,

speech, and redress of grievances. Because, the money gifts I do get, but still legally indigent, is needed for other things not provided by State here at DCC yet like food, yes - to your surprise, I have to buy food to supplement the lack of nutrition, unhealthy, degrading food served here - ACTUALLY. Inmates having to eat here must be interviewed of what actually ends up on the trays. Type of food served is contrary to the generally accepted professional standard being great food, not the cheapest and least amounts possible as custodians keep getting away with here.

Custodian also does not provided the rest of the necessities of life sold at the commissary. I am ~~not~~ not provided, as most others here, a useful job, or atleast get idle pay as other prisons, to purchase these other necessities of life. Snowball effect going down a mountain. Management here has been severely illegal, inhumane. We only have hope now with the new Commissioner Danberg can fix these daily damages caused by custodians. With of course this Court oversight, and Monitor court appointed who actually interview all inmates regularly to find out what is REALLY going on.

Claim - Johnson and now Martin continue/d to deny priority access to law library on times when I had/have court deadline dates. Prison rule says, inmates with court deadlines receive priority appointments to use library. This has just been understood by me to knowingly now apply for court relief. Supervisors continued to ignore legal right on grievances also since Dec 1999. Like now for this case, no priority appointments daily to present all legal meritorious issues in a proper way, in time. I have other cases which continue to receive this ill-will deliberate indifference to legal rights under color of law conduct by Respondents.

Thus, the widespread practice or customs meet standard of imposition of official liability for purposes of 42 § 1983, et.al, and for discrimination against classes, and for organized crime in state government.

Constitutional rights to meaningful access to courts was clearly established well before conduct of pattern of harassment, exclusion from information access for meritorious access to courts legally, and confiscation or threat thereof in connection with inmates' use of law library clearly infringes his right to access to courts under 42 § 1983.

Supervisors condoned, facilitated, allowed, were /are moving force of harassment and arbitrary, acting automatic as if above the law, motivated by caprice, and ill-will, acting despotic.

Excluding from law library and unobstructed information access as from the internet for timely, equal, effective, meaningful, capable, and adequate access to the courts violating Constitution, for starters.

Coupled with the specific information provided, and to be seen from grievances, revealing supervisors knowledge for years to correct, but continued inaction or lack of care adequate to support the claims of deliberate indifference or reckless indifference to foreseeable damages or disruptive effect liable under 42 § 1983, for starters.

Respondents conduct violates clearly established statutory or constitutional rights of which reasonable person would have known for § 1983, atleast.

Intentional infliction, and attempts to incite, of emotional distress causing severing distress to already mentally disabled, emotionally disabled Petitioner, me, and others similarly situated to be determined with counsel appointed, where I already have physical injuries /damages from this kind of conduct from custodians, including Respondents, to be revealed with counsel if necessary, when necessary, which Hazzard and Henry and ^{now} other custodians know of.

Custodians / Respondents conduct is so outrageous in character causing continuous physical injuries to me, at least, for years now, exceeding all reasonable bounds of human decency that I am only now finally able to start informing this Court for relief, which should never have been necessary if custodians were doing their duty. Respondents conduct is thus violent, insulting to equal rights and equal justice for all.

Respondents continues incitement over the years of anger and resentment, gross insults to humane needs and necessities of life, having now caused extreme resentment towards my custodians by their extremely offensive conduct by deliberate indifference to duty, being constantly under insult, shame conditions shocking me to a faster death.

Respondents conduct is criminally offensive by putting me illegally under / in substantial risk of death or serious, irreparable, life-long injury, as being assaultive and battering.

Respondents conduct is intentionally reckless. Actors may say they do not desire harmful consequences but, nonetheless, foresee the possibility and consciously still take the risks. Obviously, they do not care about their actions causing consequences or they would have stopped long ago.

What we continue to have here is failures to train, and/or control and supervise properly, legally, ethically. Such state of mind of these Respondents, and those similarly situated, will likely never be retrainable because of the years of engrained actions and lack of accountability ~~for~~ for the wards, which this case hopes to stop, with this Court's wisdom.

The distress I am under, and cringe ~~for~~ ^{for} those similarly situated, is so extreme because of living under constant threat of punishment

for living and overly obtrusive, invasive, unnecessary prison rules & similarly situated have to live under due to custodians state of mind; Over-regimentation improfessional, mass punishment conditions, insecure in person, living conditions, private property, and lack of necessities of life, for starters.

This constant, 24-7 punishment actually illegal because inmates are here as punishment, not for punishment, keeps my nerves at a constant state of high tension/stress and all the physical injuries resulting from that. The conditions in this Dept for wards like me are damaging, under constant danger of punishment or injury in desperate need for relief.

Respondents/Custodians treatment is without proper intellect, given to study and education, nor sound mind, nor decent, nor conforming to standards of socially acceptable humane and educated treatment of wards of State, nor of quality to cause NO damage to ward of State, as me.

Their conduct is NOT civilized because it has not kept up with advanced and ordered stages of cultural and legal development.

Their conduct is contrary to society's common interests and standards as in our laws.

Besides 42 § 1983, § 1988 is involved, if I can correctly remember, and some surrounding §'s.

Of course, this suit is for individual and official capacities since Dec 1, 1999.

Thus, Respondents, et.al., consistently, and without cause, interfered with my access to courts in too many ways I can mention right here, right now, it is so overwhelming, by continual berating, frustrating, harassing

me, and others, capriciously denying legal rights to legal materials, and unobstructed conditions for legal access to courts, by barring from law library and denial of information like from internet to legally prepare my defenses and claims so that they are meritorious, and now having already illegally forced me to throw away 4 of my 7 boxes of legal materials which all fit nicely under my bed, while leaving me under constant fear of further, 24-7, punishment by taking the rest causing further irreparable ~~loss~~ damages.

Intentionally negligent supervision by law and acquiescence encouraged Respondents, et al, to continue to deprive me of legal access to the courts.

Maliciously or capriciously, when inmate pets were allowed in, and when prison rule required allowable access, and when prison rule allows priority access to those with court deadlines as I have/had to have when the law library spaces filled up by sign-ups. Remembering that this law library space has not sufficiently grown in years with the population.

An empty adjoining room to law library, ~~1st~~ building, was available for use for years before it was opened, in custodians Edward Johnson, Grady, Francine Kobus, Mike Little, Warden Snyder and Carroll's, and Howard, Taylor's continues deliberate indifference to legal rights of their wards which they continue to fail to uphold.

'Meaningful' access rights are in Bounds v. Smith, 97 S. Ct. 1491, 1498 (1973).

Ongoing pattern of harassment and arbitrary exclusion by me is sufficient to state a meaningful access claim for surviving Rule 12 motion.

Hazzard and Henry violate DOC rules of conduct. Too many to list here.

The 5th Circuit declared that access to courts entails not only freedom to file pleadings but also freedom to employ, without retaliation or harassment, those accessories without which legal claims cannot be effectively asserted.

Ruiz v. Estelle, 679 F2d 1115, 1153 (1980).

Johnson v. Avery, 89 S.Ct 747, 748 (1969), 'access of prisoners to the courts for the purpose of presenting their complaints may not be denied or obstructed';

Evans v. Moseley, 455 F2d 1084, 1087 (10th Cir), 'prison officials may not unreasonably, without education, without intellect, without fairness, without improper conduct | condition, | hamper [impede, restrain, fetter] inmates in gaining access to courts.' In a meritorious manner, and legal manner.

Courts have repeatedly recognized that actions similar to those of Respondents, et al, constitute denials of meaningful access to courts. e.g.

Morello v. James, 810 F2d 344, 346-7 (2d Cir 1987),

Simmons v. Dickhaut, 804 F2d 182, 185 (1st Cir, 1986),

Wright v. Newsome, 795 F2d 964, 968 (11th Cir, 1986),

Carter v. Hutto, 781 F2d 1028, 1031-2 (4th Cir, 1986).

Actual injuries in legal actions by me caused by custodians Johnson, Little, Kobus, Snyder, Carsoll, Howard, Taylor, Brady include delays and incomplete motions for criminal case Motion To Dismiss, Habeas Corpus, Post-Conviction Motion, and three civil complaints still incomplete and hampered throughout denying Constitutional rights for legal access to courts. Expansion of record available when Counsel appointed, if needed.


Prison rules, Respondents duties by law are not constitutional policy or custom.

Thus, systemic, systematic, widespread corrupt conditions under

conspiracies to deprive wards of State of legal rights.

Prison rule makers were Robert Snyder and Thomas Carroll, former and current wardens; Actors under color of law.

Supervisors encouraged to deny legal rights, for deliberate indifference interference, as in grievances. Custodian replies usually mislead and/or omit legal issues to further obstruct justice, for ^{own} official custom/practice/

 Turpin ———, 619 F 2d at 201.

Rights of no harassment, exclusion, and confiscation, denial of accessories in connection with Petitioner's, me, and as one of inmate class, use of law library clearly infringed my right of access to court to use law library, legally, fairly, ethically. These clearly infringe my rights of access to the courts as existed.

Supervisors acquiescence, encouraged, allowed conduct revealing their knowledge and inaction to legal rights they had been responsible and accountable to uphold all along, is adequate for deliberate or reckless indifference to a foreseeable disruptive effect.

It is custom or policy that chain of command monitors all grievances; thus aware of similar grievances filed by similarly situated also.

Prison Rule XX I. Legal Services, authorized by Carroll on 6/8/05:

E. "Inmates with a court-ordered filing date may receive additional time in the law library. Such appointments preempt other scheduled appointments for inmates without court ordered dates."

But, I, continuously over the years been denied this legal right arbitrarily and/or capriciously by Johnson, Kobus, Little, Snyder, Carroll, and others to be named as verified by grievances or other communication with them, in their deliberate indifferent, and ill-will, malicious states of mind.

B. "Legal photocopying services are available from the law library." No arbitrary, nor licensed legal counsel for me is here to counsel me on my cases, yet Johnson, Martin, continuously deny, as if a court appointed counsel for my cases, copies of legal materials to do my pro se legal work. Most recently copies for a letter to attorneys to acquire legal representation; Copy of a grievance for which no reply has been received;

A. "The Delaware Correctional Center provides law library services to the inmate population." Is illegally vague doctrine allowing illegal obstructions to occur because of lack of proper policy and procedures.

C. "Law library appointments are scheduled by the paralegal." He is responsible for obstructions to legal access to courts for failing to properly schedule, me, and others, as needed by us. No one knows us and what we need for our case(s), our abilities, disabilities, since we are still ultimately still legally responsible for our cases and contemplated cases even if represented by counsel.

Legal postage, state is required to provide reasonable postage. This state provides NONE free, especially to legally indigent. Reasonable is all legal mail an inmate sends, or it would obstruct access to courts. e.g. Morello v. James, 810 F2d 344 (2d Cir. 1987), [3]. Thus, denied, failure of, procedural redress. As all the other obstructions, handicaps caused by Respondents, and others to be named with Counsel, No communication, desire, or intent of reparation has ever been offered by a custodian. Violating at least 15th, 14th, and section 1983.

These, and other, access to courts violations by custodians are at least a pervasive risk of harm, and actual physical + mental/emotional serious injuries

to me, and yet unknown other inmates due to custodians deliberate indifference to find out properly, and continues sweeping under the carpet, ignoring, ostrich effect conduct by them, in violation of prisoners EIGHTH Amendment rights actionable under atleast section 1983, by denial of due process and equal protection of the laws for legal access to courts.

It also violates my FOURTH Amendment, EIGHTH Amendment, FOURTEENTH Amendment, connected rights to be free from malicious, injuries, search or seizure as continually was done ~~by~~ of my private property denying me security/safety/good health ~~from~~ to my person, property, liberty to be free from constant 24-7 threat of punishment when actually not legitimately, validly, penologically required, as Respondents, et al, acted in their individual capacity under pretence of law. And excessive use of verbal force to accomplish damages; abusing authority and officially oppressing under pretence of law.

Thus, we have procedural due process violations and intentional violations of my, et al, substantial rights of access to the courts.

Actual legal injuries shown by needing continuous extensions for doing Civil Complaint Amendment now due to legal obstructions caused by Respondents/Custodians and disabilities caused ~~by~~ by their damages to me.

The Supreme Court has held that this right of access requires prison authorities to provide prisoners with "the capability of bringing contemplated challenges to sentences or conditions of confinement before the courts." Lewis v. Casey, 116 S.Ct 2174 (1996).

Prison Rule V. Authorized Cell Items. C. Items Allowed. 2. "A written request for an additional box for storage of legal materials for active case(s) can be made to the Deputy Warden II. The request must

include the case number and court in which the pending case(s) is active." Problems with rule: A. Rule not adopted legally by Administrative Procedure Acts, State and Federal, Administrative Law and Procedure because, for one, its blatantly illegal obstructing access to courts and no ethical attorney would ever allow such a rule be made as for legal counsel for Dept of Corrections to be named as Respondent. Upon info and belief, and due to denial of sufficient time to read all needed legal materials by nonlettered inmate citizen with inabilities and disabilities, notice and hearing was I, too, denied under Acts.

The amount of legal materials an inmate needs, especially a disabled one, depends on the inmates abilities, obstructions to timely, equal, effective, meaningful, capable, and adequate access to information not available here in this Dept of Corrections by these legal custodians states of mind.

Especially when a citizen has to learn the subject areas of law, file meaningful papers as best as we can, indigency denying due process and equal protection of the laws here in this Dept under past custodians conduct, which more than likely, would NOT have changed to legal, generally accepted standards if it were NOT for this case, because custodians continue to breach their duty, by conflict of interest, egotistical, uneducated selfishness, for starters.

Dated: Mar 20, 2007

Respectfully Submitted,
In Service To God And Country,
Dettel Ott

SBT No. 229843

DCC

Smyrna, DE 19977